

EXHIBIT 1

3. I submit this affidavit in support of Defendants Hartford Accident and Indemnity Company ("Hartford A&I") and First State Insurance Company's ("First State") (collectively, "Hartford") Opposition to Plaintiffs' Motion to Remand filed by Boy Scouts of America ("BSA"), Connecticut Yankee Council ("Connecticut Council"), Spirit of Adventure Council ("Spirit Counsel"), Aloha Council, and Cascade Pacific Council ("Cascade Council").

4. Hartford issued a number of primary, umbrella and/or excess policies to BSA for certain periods from September 21, 1971 to January 1, 1978.

5. For several years, BSA has tendered underlying sexual abuse lawsuits to Hartford. Hartford defended and settled claims on behalf of BSA. BSA or its counsel, rather than the local councils, interacted with Hartford, including communicating selection of counsel, settlement and resolution of any disputes.

6. Over the past decade, Hartford and BSA have had at least two disputes regarding the availability and scope of coverage available under the Hartford policies. Hartford and BSA are parties to two separate written settlement agreements resolving those prior disputes; neither Connecticut Council, nor any of the other local councils are parties to those agreements. The terms of the settlement agreements (but not their existence) are confidential.

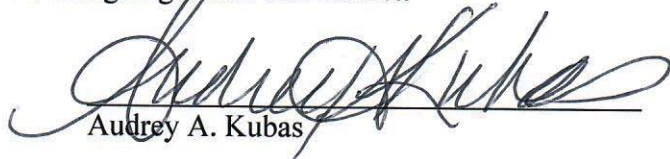
7. Hartford has informed BSA of its positions, dating back to at least 2012. None of the local councils, however, has written separately to Hartford to express disagreement with Hartford's positions regarding these issues.

8. Hartford has continued to participate in funding settlements of underlying claims during the pendency of this coverage action. Those settlements are confidential.

9. Many of the claims that Hartford is not defending and has not settled are cases that BSA (and the councils) never tendered to Hartford.

10. Attached as Exhibit A is a true and correct copy of the August 2, 2018 letter from T. Hill regarding the case styled *John Doe 1, et al. v. Boy Scouts of America Corporation, et al.*, Cause No. FSTCV185019749 filed in the Superior Court of the State of Connecticut. Hartford is seeking leave of the Court to file Exhibit A under seal.

I declare under penalty of perjury that the foregoing is true and correct.


Audrey A. Kubas

Sworn to me this

15th day of July, 2019

Notary Public



County of Tolland
Town of Ellington

My Commission Expires:

